

LAW OFFICES OF JILL R. SHELLOW PLLC

MEMO ENDORSED

15 Chester Avenue
 White Plains, NY 10601
 jrs@shellowlaw.com
 212.792.4911 (Telephone)
 203.258.1463 (Mobile)

Application GRANTED. The defense pretrial motions deadlines are EXTENDED as follows: Defendant's motion(s), if any, shall be by August 16, 2024, Government's responses shall be filed by August 30, 2024. Defendant's reply shall be filed by September 6, 2024. The Clerk of Court is respectfully directed to terminate the letter motion at ECF No. 30.

July 11, 2024

BY ECF AND EMAIL

The Honorable Lewis J. Liman
 The Honorable Jessica G.L. Clarke
 United States District Judges
 Southern District of New York
 500 Pearl Street
 New York, NY 10007
LimanNYSDChambers@nysd.uscourts.gov
ClarkeNYSDChambers@nysd.uscourts.gov

SO ORDERED.

JESSICA G. L. CLARKE
 United States District Judge

Dated: August 5, 2024
 New York, New York

RE: *U.S. v. Cristian and Heriberto Eustate Espinal, 23 Cr. 577 (LJL)*
U.S. v. Cristian Eustate Espinal, 23 Cr. 619 (JGLC)

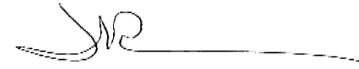
Dear Judge Liman and Judge Clarke:

I represent Cristian Eustate Espinal in the above cases, and I am writing to request a 30 day extension of the July 15 motions deadline. The Government consents. As to the matter pending before Judge Lewis J. Liman only, John Kaley, Esq., counsel for Heriberto Eustate Espinal joins in this request.

First, this week the Government is producing another 4 TB of discovery – mostly cell phones – from another related case. This brings to three the number of related prosecutions for which discovery is being cross-produced. The Government advises that the new production is in an abundance of caution. Thus, in an abundance of caution we need to review the contents. Second, I am engaged in discussions with the Government about a pretrial disposition, and we need more time mostly because of technical problems associated with our analysis of the child pornography. The government is not at fault. Their agents have gone out of their way to be of assistance, but due to hardware limitations, the problems have been unavoidable.

Thank you for your consideration.

Respectfully submitted,


 Jill R. Shellow

cc: All Counsel (by ECF)

Admitted: NY, CT, DC